

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

UNILOC 2017 LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action Nos. 2:18-cv-00491, -492, -493,  
-494, -495, -496, -497, -499, -500, -501, -502,  
-503, -504, -548, -550, -551, -552, -553

**FILED UNDER SEAL PURSUANT TO  
PROTECTIVE ORDER**

**JURY TRIAL DEMANDED**

**DECLARATION OF DEEPA ACHARYA IN SUPPORT OF DEFENDANT GOOGLE  
LLC'S RENEWED MOTION TO TRANSFER VENUE TO THE NORTHERN  
DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404**

I, Deepa Acharya, declare as follows:

1. I am a partner at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google LLC ("Google") in Case No. 2:18-cv-553. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.
2. Attached hereto as Exhibit A is a true and correct copy of the Declaration of Patrick Orr, executed June 27, 2019.
3. Attached hereto as Exhibit B is a true and correct copy of the excerpts of Google's Amended Initial and Additional Disclosure Statement, served October 17, 2019.
4. Attached hereto as Exhibit C is a true and correct copy of the Declaration of Sallie Lim, executed March 21, 2019.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

6. Attached hereto as Exhibit E is a true and correct copy of excerpts of the [REDACTED]

[REDACTED]

7. Attached hereto as Exhibit F is a true and correct copy of the LinkedIn profile of Drake Turner.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts of the Memorandum Order and Opinion, dated December 22, 2017 and filed in the case *Uniloc USA, Inc. v. Apple Inc.*, No. 2:17-cv-258 (E.D. Tex.).

9. Attached hereto as Exhibit H is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

10. Attached hereto as Exhibit I is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

11. Attached hereto as Exhibit J is a true and correct copy of the LinkedIn profile of Craig Etchegoyen.

12. Attached hereto as Exhibit K is a true and correct copy with annotations of the entity search for “Uniloc 2017 LLC” in the Texas Secretary of State website.

13. Attached hereto as Exhibit L is a true and correct copy of excerpts of the transcript of the August 3, 2017 Deposition of Sean Dylan Burdick, P.E, filed as Dkt. 24-3 in the case *Uniloc USA, Inc. v. Apple Inc.*, No. 2:17-cv-571 (E.D. Tex.).

14. Attached hereto as Exhibit M is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

15. Attached hereto as Exhibit N is a true and correct copy of screenshots with annotations of [REDACTED]

[REDACTED]

16. Attached hereto as Exhibit O is a true and correct copy of screenshots with annotations of [REDACTED]

[REDACTED]

17. Attached hereto as Exhibit P is a true and correct copy of screenshots with annotations of [REDACTED]

[REDACTED]

18. Attached hereto as Exhibit Q is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

19. Attached hereto as Exhibit R is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

20. Attached hereto as Exhibit S is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

21. Attached hereto as Exhibit T is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

22. Attached hereto as Exhibit U is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

23. Attached hereto as Exhibit V is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

24. Attached hereto as Exhibit W is a true and correct copy of the LinkedIn profile of Chad Meisinger.

25. Attached hereto as Exhibit X is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

26. Attached hereto as Exhibit Y is a true and correct copy of the webpage <https://www.fortress.com/contact> (last accessed on October 17, 2019).

27. Attached hereto as Exhibit Z is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

28. Attached hereto as Exhibit AA is a true and correct copy of Google's Motion to Compel Fortress Investment Group, Fortress Credit Co. LLC, and CF Uniloc Holdings LLC to Comply with Subpoenas on an Expedited Basis, filed as D.I. 1 in the case *Google LLC v. Fortress Investment Group*, No. 1:19-mc-00202-RGA (D. Del.).

29. Attached hereto as Exhibit AB is a true and correct copy of excerpts of [REDACTED]

[REDACTED]

[REDACTED]

30. Attached hereto as Exhibit AC is a true and correct copy of excerpts of [REDACTED]

31. Attached hereto as Exhibit AD is a true and correct copy of excerpts of [REDACTED]

32. Attached hereto as Exhibit AE is a true and correct copy of excerpts of the transcript of the September 21, 2018 Deposition of Erez Levy, filed as Dkt. 168-18 in the case *Uniloc USA, Inc. v. Apple Inc.*, No. 3:18-cv-360 (N.D. Cal.).

33. Attached hereto as Exhibit AF is a true and correct copy of excerpts of the transcript of the Deposition of Drake Turner, filed as Dkt. 168-19 in the case *Uniloc USA, Inc. v. Apple Inc.*, No. 3:18-cv-360 (N.D. Cal.).

34. Attached hereto as Exhibit AG is a true and correct copy of the LinkedIn profile of [REDACTED]

35. Attached hereto as Exhibit AH is a true and correct copy of the LinkedIn profile of [REDACTED]

36. Attached hereto as Exhibit AI is a true and correct copy of the Fortress website bio of [REDACTED]

37. Attached hereto as Exhibit AJ is a true and correct copy of the LinkedIn profile of [REDACTED]

38. Attached hereto as Exhibit AK is a true and correct copy of the LinkedIn profile of [REDACTED]

39. Attached hereto as Exhibit AL is a true and correct copy of the LinkedIn profile of [REDACTED]

40. Attached hereto as Exhibit AM is a true and correct copy of the LinkedIn profile of

[REDACTED]

41. Attached hereto as Exhibit AN is a true and correct copy of the LinkedIn profile of

[REDACTED]

42. Attached hereto as Exhibit AO is a true and correct copy of the LinkedIn profile of

[REDACTED]

43. Attached hereto as Exhibit AP is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

44. Attached hereto as Exhibit AQ is Table C-5, U.S. District Courts—Median Time Intervals From Filing to Disposition of Civil Cases Terminated, by District and Method of Disposition, During the 12-Month Period Ending June 30, 2019.

45. Attached hereto as Exhibit AR is a true and correct copy of excerpts of the United States District Courts — National Judicial Caseload Profile, ending in June 30, 2019.

46. Attached hereto as Exhibit AS is a true and correct copy of the webpage <https://www.whitepages.com/business/CA/San-Jose/Etri-Us-R-D-Center/b-17j7buj> (last accessed on October 18, 2019).

47. Attached hereto as Exhibit AT is a true and correct copy of U.S. Pat. No. 5,331,556.

48. Attached hereto as Exhibit AU is a true and correct copy of the LinkedIn profile of Uri Zernik.

49. Attached hereto as Exhibit AV is a true and correct copy of U.S. Pat. No. 5,598,557.

50. Attached hereto as Exhibit AW is a true and correct copy of the LinkedIn profile of Chris Doner.

51. Attached hereto as Exhibit AX is a true and correct copy of the article “A Summary of the CLARIT Project,” authored by David A. Evans, Steve K. Handerson, Robert G. Lefferts, and Ira A. Monarch.

52. Attached hereto as Exhibit AY is a true and correct copy of the LinkedIn profile of Dr. David A. Evans.

53. Attached hereto as Exhibit AZ is a true and correct copy of the article “Word Sense Disambiguation for Free-text Indexing Using a Massive Semantic Network,” authored by Michael Sussna.

54. Attached hereto as Exhibit BA is a true and correct copy of the LinkedIn profile of Michael Sussna.

55. Attached hereto as Exhibit BB is a true and correct copy of the article “Natural Language Information Retrieval: TREC-4 Report,” authored by Tomek Strzalkowski and Jose Perez Carballo.

56. Attached hereto as Exhibit BC is a true and correct copy of the LinkedIn profile of Jose Perez Carballo.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed October 18, 2019 in Washington, D.C.



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Deepa Acharya